

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ROADSYNC, INC.,

Plaintiff,

v.

RELAY PAYMENTS, INC.,
SPENCER BARKOFF, and
JAMES RYAN DROEGE,

Defendants.

Case No.: 1:21-CV-03420-MLB

**DECLARATION OF ELISABETH B. MILLER
IN SUPPORT OF MOTION TO STRIKE AND EXCLUDE THE
TESTIMONY OF PAUL DOPP**

1. My name is Elisabeth B. Miller. I am over the age of 18 and have personal knowledge of the matters set forth herein. I am providing this declaration in support of Defendants' Motion to Strike and Exclude the Testimony of Paul Dopp.

2. I am Of Counsel with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, and represent Defendants Relay Payments, Inc., Spencer Barkoff, and James Ryan Droege in the above-captioned action.

3. Attached as Exhibit A is a true and correct copy of Plaintiff RoadSync's Initial Disclosures, dated October 21, 2022.

4. Attached as Exhibit B is a true and correct copy of RoadSync's Supplemental Responses and Objections to Defendants' Interrogatory No. 9, dated September 28, 2023.

5. Attached as Exhibit C is a true and correct copy of the Expert Report of Paul Dopp, dated January 3, 2024.

6. Attached as Exhibit D is a true and correct copy of excerpts of the transcript of the Deposition of Paul Dopp, dated February 13, 2024.

7. Attached as Exhibit E is a true and correct copy of the Expert Report of Daniel J. Cenatempo, dated February 16, 2024, including a true and correct copy of the amended Appendix C, dated February 19, 2024.

8. Attached as Exhibit F is a true and correct copy of Relay's Profit and Loss Statement from January 2019 to December 2022, produced by Defendants to RoadSync on September 15, 2023, at RELAY0264007–RELAY0264008.

9. Attached as Exhibit G is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) Deposition of Relay Payments, Inc. through James Ryan Droege, dated September 25, 2023.

10. Attached as Exhibit H is a true and correct copy of the cover email showing Defendants' production to RoadSync on September 15, 2023 of documents including Relay's Profit and Loss Statement from January 2019 to December 2022, at RELAY0264007–RELAY0264008.

11. Attached as Exhibit I is a true and correct copy of Relay's Profit and Loss Statement from January to December 2023, produced by Defendants to RoadSync on February 9, 2024, at RELAY0268198–RELAY0268201.

12. Attached as Exhibit J is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) Deposition of RoadSync, Inc. through Robin Gregg, dated August 3, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2024.

/s/ Elisabeth B. Miller

Elisabeth B. Miller